

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
GAYLE L. BAILEY,)	
)	
Plaintiff,)	
)	
v.)	
)	Civil Action No. 04-12101-NG
UNITED STATES OF AMERICA AND)	
MELISSA PARENT)	
)	
Defendants.)	
_____)	

**ASSENTED TO MOTION FOR EXTENSION OF TIME
TO ANSWER AND/OR OTHERWISE RESPOND**

The United States respectfully requests an extension of time up to, and including, March 11, 2005, to answer or otherwise respond to the plaintiff's Amended Complaint. Counsel for the United States conferred with counsel for the plaintiff on February 17, 2005. Counsel for the plaintiff assents to the extension of time.

This action is the result of a motor vehicle accident in Lowell, Massachusetts involving the plaintiff and a motor vehicle owned by the United States Navy. This action arises under the Federal Tort Claims Act, 28 U.S.C. § 2671, et seq. The parties have agreed to the extension of time for the defendants to respond to the plaintiff's Amended Complaint in hopes of resolving the dispute without further litigation.

\\

\\

\\

\\

\\

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Jeffrey M. Cohen
Jeffrey M. Cohen
Assistant U.S. Attorney
John Joseph Moakley Federal Courthouse
One Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3100

Dated: February 17, 2005

CERTIFICATION UNDER L.R. 7.1

I, Jeffrey M. Cohen, Assistant United States Attorney, do hereby state that on February 17, 2005, I spoke with Attorney Maria Murber and she assented to this Motion for Extension of Time.

/s/ Jeffrey M. Cohen
Jeffrey M. Cohen
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I certify that on February 17, 2005, I caused a copy of the foregoing Motion to be served on Plaintiff by first class mail, postage pre-paid to Maria Murber, 264 Broadway, Suite 602, Methuen, MA 01844.

/s/ Jeffrey M. Cohen
Jeffrey M. Cohen
Assistant U.S. Attorney